

**IN THE DISTRICT COURT OF THE UNITED STATES
FOR THE DISTRICT OF SOUTH CAROLINA
SPARTANBURG DIVISION**

BEEQB, LLC, a Florida corporation,

Plaintiff,

v.

**BLOCKQUARRY CORP. f/k/a ISW
HOLDINGS, INC., a Nevada Corporation,
and PANTHEON RESOURCES, INC.,**

Defendant.

Case No. _____

**PLAINTIFF'S ANSWERS TO LOCAL
RULE 26.01 INTERROGATORIES**

(A) State the full name, address, and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of that interest.

None to the knowledge of the Plaintiff.

(B) As to each claim, state whether it should be tried jury or nonjury and why.

The claims for negligence of the bailee, breach of contract, and conversion are claims in law that are appropriately tried before a jury. The claim for unjust enrichment is a claim in equity that is appropriately tried before a judge.

(C) State whether the party submitting these responses is a publicly owned company and separately identify (1) any parent corporation and any publicly held corporation owning ten percent (10%) or more of the party's stock; (2) each publicly owned company of which it is a parent; and (3) each publicly owned company in which the party owns ten percent (10%) or more of the outstanding shares.

Beeqb, LLC is a privately owned limited liability company.

(D) State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division). *See* Local Civ. Rule 3.01 (D.S.C.).

The most substantial part of the events or omissions giving rise to the Plaintiff's claims occurred in Cherokee County, South Carolina.

(E) Is this action related in whole or in part to any other matter filed in this district, whether civil or criminal? If so, provide (1) a short caption and the full case number of the related action; (2) an explanation of how the matters are related; and (3) a statement of the status of the related action.

This case relates to that of Blockquarry Corp. v Litchain Corp., et al., 7:23-cv-1427-TMC in that the premises, Bitcoin mining operations, and the disputes related thereto at the heart of the previous case also form the factual backdrop of the present case. The parties stipulated to the dismissal of the previous case on April 12, 2024 and the case was terminated on April 16, 2024.

(H) *Parties or Intervenorors in a Diversity Case.* In an action in which jurisdiction is based on diversity under 28 U.S.C. § 1332(a), a party or intervenor must, unless the court orders otherwise, name – and identify the citizenship of – every individual or entity whose citizenship is attributed to that party or intervenor.

Beequb, LLC: Florida

Blockquarry Corp.: Nevada

Pantheon Resources, Inc.: Delaware

Date: May 23, 2024

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*Pro Hac Vice Motions forthcoming**Attorneys for Plaintiff, Beeqb, LLC*